



Rocky Flats Environmental Technology Site
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96-RM-TA-0168-KH

Karan North, Division Manager
Compliance and Performance Assurance
Building T130C
Kaiser-Hill Company, L.L.C.

Subject: ENVIRONMENTAL COMPLIANCE CRITERIA PLAN, ENVIRONMENTAL GOALS,
AND PERFORMANCE MEASURES GRK-0240-96

On July 11, 1996, Rocky Mountain Remediation Services, L.L.C. (RMRS) signed Performance Measure 96P4. Attachment B to this document identifies a performance metric that consists of twelve items. These items are consistent with environmental goals that are shown in section 7.0 of the Environmental Compliance Criteria Plan, dated June 10, 1996. RMRS committed to implementing Environmental Compliance Criteria Plan by submittal of our June 26, 1996 letter to Kaiser-Hill. Of the twelve environmental goals, the following six are defined as the primary responsibility of Kaiser-Hill:

- Regulatory Review
- Personnel Environmental Performance Measures
- Environmental Leadership Team
- Sitewide Environmental Management System
- Independent Performance and Compliance Assessments
- Management Assessment Program

The remaining six environmental goals were delegated to the Site subcontractors for implementation. These six goals are defined as follows:

- Written Requirements Document
- Training
- EPM/ETA Program
- Environmental Manager
- Sitewide Environmental Management System
- Plant Action Tracking System
- Accountability

RMRS is pleased to provide information discussing our achievement of the twelve goals. Completion of the goals or a similar commitment to the Kaiser-Hill team in attainment of the 12 goals is demonstrated by the following discussions.

Regulatory Review RMRS is grateful for your regulatory review efforts. The biweekly report, which is generated by Kaiser-Hill, is distributed to the Environmental Technical Advisors as well as selected managers. In addition to the regulatory review efforts of your staff, RMRS utilizes the Internet to stay current with regulatory developments and has routinely distributed the revisions to the Colorado Hazardous Waste Regulations to Site employees.

Written Requirements Document A building book audit associated with all of the buildings that RMRS controls indicates that the books need to be updated. Revisions to the contacts designated in the books has been initiated. This process will be finalized following the VSPP departure date of September 27, 1996. The revisions will be based upon the findings discussed in the independent assessment that was conducted by your staff during the week of July 27, 1996. Revisions to the building books accommodating the revised table of contents will be completed during FY97.

Training RMRS has completed RCRA training, in accordance with the modified RCRA Part B Permit. This training was completed for all employees conducting RCRA governed jobs. Additionally, RMRS supplied RCRA training to all managers who manage, supervise, or are affiliated with RCRA workers. The annual RCRA training was conducted over a two-month period during FY96. RMRS also conducted WSRIC, waste generator, and compliance awareness training for personnel. A significant training effort was implemented for the hourly employees that support decommissioning work. This effort resulted in 36 employees being fully trained to conduct decommissioning activities.

RMRS is committed to assuring that our employees are appropriately trained and that we pass this information on to other Site employees. In support of this action, RMRS employees have routinely been instructors at the EPM/ETA Thursday afternoon meetings

Personnel Environmental Performance Measures By RMRS letter dated August 8, 1996, the Guidelines for Completing the Employee Performance Form, General Instructions were distributed to all RMRS managers. Section IV - Professional Conduct, was modified by the cooperative efforts of the Human Resources Departments with in Kaiser-Hill and RMRS. The modification to the rating criteria states: "...demonstrates a commitment to Environmental & Waste Management programs, as well as, stewardship and compliance..." During the individual employee performance appraisals, all RMRS employees were rated according to this environmental compliance criteria.

Environmental Leadership Team RMRS has appointed an Environmental Manager who routinely attends the Environmental Leadership Team meetings. The information exchange that takes place at these meetings assures that a consistent environmental message is communicated to the Kaiser-Hill team. Meeting minutes from this meeting are routinely disseminated to the RMRS Environmental Technical Advisors and RMRS management.

EPM/ETA Program RMRS has carefully considered your direction as well as the environmental leadership needs of our company. It is an operational requirement that environmental stewardship and associated compliance be given the same priority as safety. In consideration of this, an environmental leadership team has been established that consists of an Environmental Manager and four Environmental Technical Advisors. The Environmental Manager is the company liaison disseminating information to the Environmental Technical Advisors, which in turn report to the Division Managers/Vice Presidents in the respective operational areas. An organizational chart showing the reporting structure was submitted to you for dissemination to other Site contractors.

Additionally, RMRS has considered the operations of the company as well as our environmental stewardship role and our compliance requirements. These roles have resulted in the development of job descriptions for the Environmental Manager and the Environmental Technical Advisors. The job descriptions for these individuals are also enclosed as Attachment 1 and 2.

Environmental Manager RMRS has appointed an Environmental Manager as well as four Environmental Technical Advisors. The Environmental Manager serves as the single point of contact for interface with environmental professionals within the Kaiser-Hill team. The Environmental Manager, the Environmental Technical Advisors, and the reporting structure are shown on the previously submitted organizational chart. The job description for the Environmental Manager is shown in Attachment 1.

Sitewide Environmental Management System (SEMS) By letter dated August 20, 1996, RMRS updated the SEMS. There were numerous modifications to the responsible individuals as well as a recommendation that the approximately 162 milestones that are identified in the Inter-Agency Agreement be eliminated from this system and replaced with applicable milestones associated with the Rocky Flats Cleanup Agreement. RMRS considers this milestone tracking system a useful tool and routinely distributes it to environmental leaders and program managers within the company.

Independent Performance and Compliance Assessments RMRS has supported the independent assessments that have been conducted by Kaiser-Hill. These assessments and the associated findings have supported environmental compliance efforts, improved our operational awareness, and are beginning to develop a consistent environmental program within all of the Kaiser-Hill team members. RMRS will continue to use the findings from these assessments, as well as the environmental assessments that are conducted by our professionals, to assure compliance with 10CFR 830.120 as well as refine and continuously improve our environmental stewardship.

Management Assessment Program RMRS is constantly assessing our environmental programs. An organized and complete management assessment of the Waste Management operations was conducted following receipt of the warning letter from CDPHE. The findings associated with this assessment were the basis for the reorganization that took place in Waste Generator Services, resulting in a defined Unit Owner as well as named Unit Custodians. This information, in the form of an "RMRS Environmental Resources" contact list, has been distributed to all environmental professionals by way of the Environmental Leadership Team meetings.

Plant Action Tracking System (PATs) PATs is a management tool that RMRS utilizes to track our progress associated with environmental issues in our respective operational areas. RMRS has designated eight individuals throughout all operational and administrative areas of the company to assure that issues are rapidly entered into the system, distributed to the responsible individuals, and appropriately resolved. Our efforts have been responsible for self-identification of over 85 percent of the listed issues as well as timely resolution of 254 issues during FY96.

Accountability This letter and the attachments are a summary of the RMRS activities associated with accountability and the Environmental Compliance Criteria Plan. RMRS recognizes the environmental and compliance responsibilities that associated with this plan and appreciates the Kaiser-Hill team assistance in resolution of compliance issues.

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RMRS is pleased with the environmental efforts that have been applied to the operational areas. Each of the operational areas have remained in compliance with the numerous regulatory documents that govern operations. Additionally, the Part A Permit has been revised to reflect currently permitted units. The Part B Permit has been rewritten, utilizing a site-wide subject matter expert group, into a streamlined format to fulfill the re-application process. These efforts have benefited from the combined efforts of the Site contractors and the teaming relationship that exists. The past year has been an environmental challenge for the entire Site. RMRS is pleased with the company efforts to comply with the regulations and the open communications that have been developed with the regulatory community as well as the other Kasier-Hill Team members.



Gary R. Konwinski
RMRS, Environmental Manager

cc:

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Gary Guinn
John Schmuck
Bob Fiehweg
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RMRS Records

Attachments: (2)
As Stated

Position: Environmental Manager

General Summary: Provides environmental information and compliance direction. Assignments are dependent on the issues that are current. Self motivation and self management are essential to assure that current issues as well as future visions are incorporated into company work tasks. Serves as technical consultant, compliance coordinator, and informational liaison in the fields of regulatory affairs and environmental compliance.

Position Responsibility: Works with a wide range of compliance, environmental, and operational issues. Makes decisions and recommendations that are recognized as authoritative and essential for compliant operations. Negotiates critical and controversial issues with environmental leadership from the integrating contractor, State and Federal regulators, and Environmental Managers in other companies. To assure that communications are functional, the Environmental Manager will routinely meet with the Environmental Technical Advisors and assure that the RCRA Permit as well as other regulatory documents are structured to meet the needs of the Site. Additionally, the Environmental Manager will attend and disseminate information acquired at the following meetings:

- Biweekly Environmental Leadership Team meetings

- Weekly Environmental Program Manager/Environmental Technical Advisor meetings

- Monthly State RCRA briefings

The Environmental Manager operates with a high degree of independence, while routinely distributing information to company legal representation and briefing the RMRS President. May direct work activities of a number of environmental professionals and operational area representatives.

Job Specifications: BS in Environmental Science or related field; MS preferred, plus fifteen years of applicable experience. Prior experience dealing with the regulatory community at DOE facilities in the fields of RCRA, CERCLA, DOE Orders, and other environmental areas is required.

Position: Environmental Technical Advisor

General Summary: Provides environmental information and compliance direction within the assigned operational area (Environmental Restoration, Waste Management, Permitting, or Engineering, Construction, and Decontamination & Decommissioning). Assignments are dependent on the issues that are current. Self motivation and self management are essential to assure that current regulatory direction is incorporated into operational work areas. Serves as technical consultant, and regulatory expert within the assigned operational area.

Position Responsibility: Works with a wide range of compliance, environmental, and operational issues. Makes decisions and recommendations that are recognized as authoritative and essential for compliant operations. Negotiates environmental positions that allow work efforts to function within the requirements established by the integrating contractor as well as State and Federal regulators. To assure that communications are functional, the Environmental Technical Advisor will routinely disseminate environmental information, associated with the assigned operational area, to the Environmental Manager.

The Environmental Technical Advisors operate with a high degree of independence, while routinely distributing information to their respective Division Managers/Vice Presidents and the Environmental Manager. May direct work activities of a number of environmental professionals within their operational areas.

Job Specifications: BS degree in Environmental Science or related field, plus ten years of applicable experience. Prior experience in environmental compliance in a CERCLA, RCRA, or other regulatory fields is required..